

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

JANE DOE,

Plaintiff,

Case No. 1:23-cv-23497-BB

v.

MIAMI GARDENS SQUARE ONE,
INC., *individually and d/b/a* TOOTSIE'S
CABARET MIAMI,

Defendant.

**MOTION TO APPEAR *PRO HAC VICE*,
CONSENT TO DESIGNATION, AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rules 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Kristen Pleszewicz of the law firm of Derek Smith Law Group, PLLC, 1 Pennsylvania Plaza #4905 New York, New York 10119, (212) 587-0760, for purposes of appearance as co-counsel on behalf of Plaintiff Jane Doe, in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Kristen Pleszewicz to receive electronic filings in this case, and in support thereof states as follows:

1. Kristen Pleszewicz is not admitted to practice in the Southern District of Florida and is a member in good standing of the New York State Bar.

2. Movant, Caroline H. Miller, Esquire, of the law firm of Derek Smith Law Group, PLLC, 1 Pennsylvania Plaza #4905 New York, New York 10119, (212) 587-0760, is a member in good standing of The Florida Bar and the United States District Court for the

Southern District of Florida and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Kristen Pleszewicz has made payment of this Court's \$200 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Kristen Pleszewicz, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Kristen Pleszewicz at email address: kristen@dereksmithlaw.com

WHEREFORE, Caroline H. Miller moves this Court to enter an Order for Kristen Pleszewicz, to appear before this Court on behalf of Jane Doe, for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Kristen Pleszewicz.

Date: January 23, 2025

Respectfully submitted,

/s/ Caroline H. Miller

Caroline H. Miller, Esq.

Florida Bar No. 1012331

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Plaintiff,

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CABARET MIAMI,

Defendant.

_____ /

CERTIFICATION OF KRISTEN PLESZEWICZ

Kristen Pleszewicz, Esquire, pursuant to Rule 4(b)(1) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys, hereby certifies that: (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; (2) I am a member in good standing of New York State Bar; and (3) I have not filed more than three pro hac vice motions in different cases in this District within the last 365 days.

/s/ Kristen Pleszewicz

Kristen Pleszewicz